

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

BLACKWATER SECURITY CONSULTING,  
LLC, *et al.*,

*Plaintiffs,*

v.

WESTCHESTER SURPLUS LINES  
INSURANCE COMPANY, *et al.*,

*Defendants.*

**Civil Action No. 05-6020 (PBT)**

**CERTIFICATION OF HARVEY BARTLE, IV  
IN SUPPORT OF PLAINTIFF'S OPPOSITION TO CERTAIN DEFENDANTS'  
MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 2255**

HARVEY BARTLE, IV hereby certifies as follows:

1. I am associated with Morgan, Lewis & Bockius LLP, which represents Plaintiffs Blackwater Security Consulting, LLC, and Blackwater Lodge and Training Center, Inc. (collectively "Blackwater") in the above-captioned action. I am licensed to practice in the courts of the Commonwealth of Pennsylvania, the State of New Jersey, and the District of Columbia, and I am admitted to practice before the United States District Court for the Eastern District of Pennsylvania.

2. I submit this certification in support of Blackwater's opposition to the Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) of Defendants Evanston Insurance Company ("Evanston"), Fidelity & Casualty Company of New York ("Fidelity"), and Liberty International Underwriters, Inc. ("Liberty").

3. Attached hereto as Exhibit 1 are true and correct copies of the relevant pages of the Corporate Profile of the ACE Group, dated October 2005.

4. Attached hereto as Exhibit 2 is a true and correct copy of the 2005 A.M. Best Insurance Report for ACE Westchester Specialty Group.

5. Attached hereto as Exhibit 3 is a true and correct copy of Policy No. GLW 778197 issued by Westchester Surplus Lines Insurance Company to Blackwater Security Consulting, LLC and Blackwater Lodge and Training Systems, Inc.

6. Attached hereto as Exhibit 4 is a true and correct copy of the 2005 A.M. Best Insurance Report for Westchester Surplus Lines Insurance Company.

7. Attached hereto as Exhibit 5 is a true and correct copy of the United States District Court for the Eastern District of North Carolina's website available at <http://www.nced.uscourts.gov/DivOff/ec.html>.

8. Attached hereto as Exhibit 6 is a true and correct copy of a map indicating the distance between Raleigh, North Carolina and Elizabeth City, North Carolina, retrieved via [www.mapquest.com](http://www.mapquest.com).

9. Attached hereto as Exhibit 7 is a true and correct copy of a map indicating the distance between Rosemary, North Carolina and Elizabeth City, North Carolina, retrieved via [www.mapquest.com](http://www.mapquest.com).

10. Attached as Exhibit 8 is a true and correct copy of the city of Elizabeth City, North Carolina's official website, available at [http://www.ci.elizabeth-city.nc.us/index.asp?Type=B\\_BASIC&SEC={2A61F98E-FB96-4A6A-BDF1-DA36B3E75800}](http://www.ci.elizabeth-city.nc.us/index.asp?Type=B_BASIC&SEC={2A61F98E-FB96-4A6A-BDF1-DA36B3E75800}).

11. Attached hereto as Exhibit 9 is a true and correct copy of a map indicating the distance between Raleigh-Durham International Airport, 2400 Terminal Blvd, Morrisville, North Carolina 27623, and the United States District Courthouse, 306 East Main Street, Elizabeth City, North Carolina 27909, retrieved via [www.mapquest.com](http://www.mapquest.com).

12. Attached hereto as Exhibit 10 is a true and correct copy of a map indicating the distance between Wake County, North Carolina Superior Court, 316 Fayetteville Street Mall, Raleigh, North Carolina, and the United States District Courthouse, 306 East Main Street, Elizabeth City, North Carolina 27909, retrieved via [www.mapquest.com](http://www.mapquest.com).

13. Attached hereto as Exhibit 11 is a true and correct copy of the 2005 A.M. Best Insurance Report for Fidelity and Casualty Company of New York.

14. Attached hereto as Exhibit 12 are true and correct copies of the relevant pages of the CNA Financial Corporation 2005 Annual Report.

15. Attached hereto as Exhibit 13 are true and correct copies of the relevant pages of the Liberty Mutual Group 2005 Annual Report.

16. Attached hereto as Exhibit 14 is a true and correct copy of the 2005 A.M. Best Insurance Report for Evanston Insurance Company.

17. Attached hereto as Exhibit 15 are true and correct copies of the relevant pages of the Markel Corporation 2005 Annual Report.

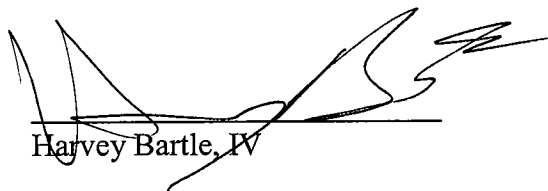
18. Attached hereto as Exhibit 16 are true and correct copies of the relevant pages of the ACE Limited 2005 Annual Report.

19. Attached hereto as Exhibit 17 is a true and correct copy of the Motion For Shortening Time For Notice Of Deposition, filed in *Nordan v. Blackwater Security Consulting LLC, et al.*, No. 05 CVS 000173 (Wake County, N.C. Sup. Ct.).

20. Attached hereto as Exhibit 18 is a true and correct copy of the Deposition Notice for John Potter, filed in *Nordan v. Blackwater Security Consulting LLC, et al.*, No. 05 CVS 000173 (Wake County, N.C. Sup. Ct.).

21. Attached hereto as Exhibit 19 are the Judicial Caseload Profile Reports for the United States District Court for the Eastern District of Pennsylvania and United States District Court for the Eastern District of North Carolina, available at <http://www.uscourts.gov/cgi-bin/cmsd2005.pl>.

22. I certify under penalty of perjury that the foregoing is true and correct. Executed on May 12, 2006.



Harvey Bartle, IV